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General Bankruptcy Counsel to
Chapter 11 Debtor and Debtor in Possession,
SEATON INVESTMENTS, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re:

SEATON INVESTMENTS, LLC, *et al.*,

Debtors and Debtors In
Possession.

- ☐ Affects All Debtors.
- ☐ Affects Seaton Investments, LLC
- ☐ Affects Colyton Investments, LLC
- ☒ Affects Broadway Avenue Investments, LLC
- ☐ Affects SLA Investments, LLC
- ☐ Affects Negev Investments, LLC
- ☐ Affects Alan Gomperts
- ☐ Affects Daniel Halevy
- ☐ Affects Susan Halevy

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ and
2:24-bk-12076-VZ

Chapter 11

**DECLARATION OF DERRICK
TALERICO IN SUPPORT OF
MOTION TO APPROVE POST-
PETITION LEASE**

Hearing:

Date: To be Set
Time: To be Set
Courtroom: 1368
255 E. Temple Street
Los Angeles, CA 90012

1 I, Derrick Talerico, hereby declare as follows:

2 1. I am an attorney duly admitted to practice law in the state of California and am
3 admitted inter alia to the United States District Court for the Central District of California, and
4 therefore to practice in the United States Bankruptcy Court for the Central District of
5 California. I have personal knowledge of the facts stated herein and knowledge based on
6 business records of my law practice and of my law firm Weintraub Zolkin Talerico & Selth
7 LLP (the "Firm").

8 2. I am the general bankruptcy counsel for Seaton Investments, LLC, ("Seaton"),
9 Colyton Investments, LLC ("Colyton"), Broadway Avenue Investments, LLC ("Broadway"), SLA
10 Investments, LLC ("SLA"), and Negev Investments, LLC ("Negev," and, collectively with Seaton,
11 Colyton, Broadway, and SLA, the "Corporate Debtors"), the above-captioned corporate chapter 11
12 debtors and debtors-in-possession.

13 3. The statements set forth in the Declaration of Ari Stock, attached hereto as
14 Exhibit A, has been confirmed and approved by Mr. Stock. Due to the Jewish holidays of
15 Sukkot and Shemini Atzeret, Mr. Stock is not able to sign this declaration until the evening
16 of October 26. When the declaration is signed, Broadway will upload it to the Court.

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct.

19 Executed on this 24th day of October, 2024, at Los Angeles, California.

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21 /s/ Derrick Talerico
22 Derrick Talerico
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EXHIBIT A

DECLARATION OF ARI STOCK

I, Ari Stock, hereby declare as follows:

1. I make this declaration in support of the Debtor's *Motion for Order Authorizing Debtor to Enter into Post-Petition Lease* (the "Motion"). Terms not defined herein shall have the same meanings ascribed to them in the Motion.

2. I am the managing member of Levav Group, LLC ("Levav"). Levav is in the healthcare business providing operational support for mental healthcare facilities. I have been in this business for 14 years. If the Lease is approved by the Bankruptcy Court, Levav will operate the medical and social services to be provided to the Los Angeles homeless and transient community from the Property.

3. Levav is committed to being a co-tenant on the lease attached as Exhibit A to the Motion (the "Lease"), subject only to the approval of the Bankruptcy Court of the Lease and the \$4 million DIP Loan brought by separate motion to the Bankruptcy Court. Levav originally intended to engage as a guarantor of the Lease, but has agreed to be a tenant and principal obligor based upon our intended role as operator of the medical and social services that will be provided at the Property. I therefore expect a final form of the Lease to be amended to remove Levav as a guarantor of the Lease.

4. Levav's commitment as a tenant is not contingent upon the application or approval of grants, subsidies, and other government and NGO incentives that may be applied for in connection with the provision of medical and social services at the Property.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on _____, at _____.

ARI STOCK

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
11766 Wilshire Blvd, Suite 730, Los Angeles, CA 90025

A true and correct copy of the foregoing document entitled (*specify*): **DECLARATION OF DERRICK TALERICO IN SUPPORT OF MOTION TO APPROVE POST-PETITION LEASE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) October 24, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See attached NEF Service List

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) October 24, 2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Vincent Zurzolo (via personal delivery)
United States Bankruptcy Court
255 E Temple St Suite 1360
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 24, 2024
Date

Martha E. Araki
Printed Name

/s/ Martha E. Araki
Signature

Seaton Investments, LLC – Jointly Administered

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- Attorneys for Corporate Debtors Seaton Investment, LLC, Colyton Investments, LLC, Broadway Avenue Investments, LLC, Negev Investments, LLC, SLA Investments, LCC.: **Derrick Talerico:** dtalerico@wztslaw.com; maraki@wztslaw.com; sfritz@wztslaw.com; admin@wztslaw.com
- Attorneys for Individual Debtors Alan Gomperts, Daniel Halevy, Susan Haley: **Zev Shechtman, Carol Chow, Turner Falk, Ryan Coy:** zev.shechtman@saul.com; zshechtman@ecf.inforuptcy.com; carol.chow@saul.com; easter.santamaria@saul.com; turner.falk@saul.com; ryan.coy@saul.com
- Attorneys for Creditor First Foundation Bank: **Scott R Albrecht:** scott.albrecht@sgsattorneys.com; jackie.nguyen@sgsattorneys.com
- Attorneys for Creditor Korth Direct Mortgage, Inc.: **Tanya Behnam:** tbehnam@polsinelli.com; tanyabehnam@gmail.com; ccripe@polsinelli.com; ladocketing@polsinelli.com
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Jacquelyn H Choi:** jacquelyn.choi@rimonlaw.com; docketingsupport@rimonlaw.com
- Attorneys for Creditor United States of America on behalf of the Internal Revenue Service: **Robert F Conte:** robert.conte@usdoj.gov; caseview.ecf@usdoj.gov; usacac.tax@usdoj.gov
- Courtesy NEF/Interested Party: **Christopher Cramer:** secured@becket-lee.com
- Attorneys for Creditor Archway Real Estate Income Fund I SPE I, LLC: **Michael G. Fletcher, Bruce D. Poltrock, Paige Selina Poupart, Gerrick Warrington:** mfletcher@frandzel.com; ppoupart@frandzel.com; gwarrington@frandzel.com; bpoltrock@frandzel.com; sking@frandzel.com; achase@frandzel.com
- Attorneys for Creditor Wells Fargo National Bank West: **Todd S Garan:** ch11ecf@aldridgepite.com; TSG@ecf.inforuptcy.com; tgaran@aldridgepite.com
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Richard Girgado:** rgirgado@counsel.lacounty.gov
- Attorneys for Creditor Harvest Small Business Finance, LLC: **Jacqueline L James:** jjames@hrhlaw.com
- Courtesy NEF/Interested Party Avi Muhtar: **Avi Edward Muhtar:** amuhtar@eaccidents.com
- Attorneys for Creditor Wells Fargo Bank, N.A.: **Jennifer C Wong:** bknotice@mccartyholthus.com; jwong@ecf.courtdrive.com
- US Trustee's Office: ustpreion16.la.ecf@usdoj.gov; **Kelly L. Morrison:** Kelly.l.morrison@usdoj.gov